

Until Experis is properly joined to the case, it is premature to try and resolve such affirmative claims.

WHEREFORE, Plaintiff Kyndryl, Inc. respectfully requests that this Court issue its Order holding the MAP deadlines in abeyance until such time as all necessary parties can meaningfully participate as contemplated by the MAP Order, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF KYNDRYL,
INC.**

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to Defendant:

vnc@rocketmail.com

/s/ Matthew P. Clune
Attorney for Plaintiff Kyndryl, Inc.